

1 ARCH Y. STOKES, Georgia State Bar No. 683100
astokes@sheastokes.com

2 SHEA STOKES, ALC
3 3593 Hemphill Street
College Park, GA 30337
4 TELEPHONE: (404)766-0076
FACSIMILE: (404)766-8823

5 PETER B. MARETZ, California State Bar No. 144826

6 pmaretz@sheastokes.com
7 SHEA STOKES, ALC
510 MARKET STREET, THIRD FLOOR
8 SAN DIEGO, CALIFORNIA 92101-7025
TELEPHONE: (619) 232-4261
9 FACSIMILE: (619) 232-4840

10 Attorneys for Four Seasons Hotels Limited, a Canadian company

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14

15 BENIGNO BACOLORES, on behalf of
himself and all others similarly situated,

16 Plaintiff,

17 v.

18 FOUR SEASONS HOTELS LIMITED, a
19 Canadian company doing business in
California, and Does 1-100, inclusive,

20 Defendant.
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CASE NO.

(San Francisco Superior Court Case No. CGC-07-467485)

DECLARATION OF SAMANTHA
WALDER IN SUPPORT OF REMOVAL OF
CIVIL ACTION FROM STATE COURT

[28 U.S.C. §§ 1332(a), 1332(d), 1441, and
1446]

ACCOMPANYING PLEADINGS:

CIVIL CASE COVER SHEET;
CERTIFICATE OF INTERESTED PARTIES
OF PERSONS; NOTICE TO FEDERAL
COURT OF REMOVAL OF CIVIL ACTION
FROM STATE COURT; DECLARATIONS
OF PETER B. MARETZ; AND LYNNE
MOORHEAD

Action Filed September 21, 2007

DECLARATION OF SAMANTHA WALDER IN
SUPPORT OF REMOVAL OF CIVIL ACTION
FROM STATE COURT

1 I, Samantha Walder, declare as follows:

2
3 1. I am the Director of Human Resources of the Four Seasons Hotel Los Angeles at
4 Beverly Hills (hereafter "FSLA"). The following is stated of my own knowledge or on my
5 review of the records of FSLA, which records I regularly rely upon and are kept in the ordinary
6 course of business. If called upon and sworn to testify, I could and would competently testify
7 thereto.

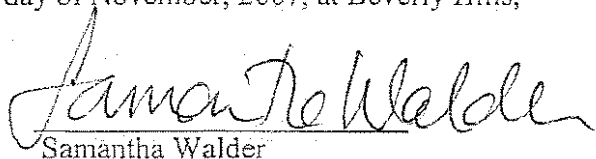
8
9 2. I am not an employee of Four Seasons Hotels Limited (hereafter "FSHL"), nor are
10 any of the employees working at the Four Seasons Hotel Los Angeles.

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12 3. I make this affidavit in support of FSHL's Notice of Removal.

13
14 4. There are currently approximately 500 full-time hourly employees working at
15 FSLA. At least for the last four years, this number has been generally consistent.

16
17 5. Benigno Bacolores worked at FSLA from April 3, 1987 until June 22, 2007. His
18 regular hourly rate as of his termination was \$17.35. Typically, Mr. Bacolores worked 5 shifts of
19 8 hours per week. Considering vacation and holidays, this amounts to approximately 240 work
20 days per year.

21
22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct. Executed this 2nd day of November, 2007, at Beverly Hills,
24 California.

25 
Samantha Walder